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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

11 CARMEN GRAY, an individual,

12 Plaintiff,

13 v.

14 THE COLLEGE NETWORK, INC., an Indiana  
15 corporation; GARY EYLER, an individual,

16 Defendant.

CASE NO. 2:10-CV-01505-RLH-LRL

**STIPULATED DISCOVERY PLAN  
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH LR 26-1(e)**

18 Plaintiff, CARMEN GRAY, and Defendant, THE COLLEGE NETWORK, INC., by and  
19 through their respective counsel of record, file this, their Stipulated Discovery Plan and  
20 Scheduling Order pursuant to Local Rule 26-1(e). The Stipulated Discovery Plan and Scheduling  
21 Order follows a telephonic Fed. R. Civ. P. Rule 26(f) conference that all counsel participated in  
22 on December 9, 2010.<sup>1</sup>

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25 <sup>1</sup> Counsel for Defendant Gary Eyler also participated in the FRCP 26(f) conference. However, a Stipulation and  
26 Order to Dismiss Defendant Gary Eyler was e-filed on December 14, 2010, and thus he is not included in this  
27 Discovery Plan.

The parties intend to conduct discovery on their respective claims and defenses and at this time and do not foresee the need to conduct discovery in phases or place limitations on the form or scope of discovery.

## **PROPOSED SCHEDULE**

**1. Fed. R. Civ. P. 26(a) Initial Disclosure:**

No changes are necessary in the timing, form, or requirement for disclosures under Fed. R. Civ. P. 26(a). The parties agree to submit initial disclosures to each other by no later than **December 23, 2010**.

**2. Estimated of Time Required for Discovery:**

Discovery will take 180 days from December 9, 2010. All discovery must be completed not later than **June 7, 2011**.

### **3. Amending the Pleadings and Adding Parties:**

Unless stated herein or ordered by the Court, the date for filing motions to amend the pleadings or to add parties shall not be later than 90 days prior to the discovery cut-off date, and therefore not later than **March 9, 2011**.

**4. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):**

In accordance with Fed. R. Civ. P. 26(a)(2), any disclosures identifying experts shall be made 60 days prior to the discovery cut-off date, and therefore not later than **April 8, 2011**, and any disclosures of rebuttal experts shall be made 30 days after the initial disclosure of experts, and therefore not later than **May 9, 2011**.

## **5. Dispositive Motions:**

The date for filing dispositive motions is 30 days after the discovery cut-off date, and therefore not later than **July 7, 2011**.

1       **6. Pretrial Orders:**

2       Pretrial Orders must be filed 30 days after the dates set for filing dispositive motions, and  
3 therefore not later than **August 6, 2011**. In the event dispositive motions are filed, the date for  
4 filing the Joint Pretrial Order shall be suspended until 30 days after the Court enters a ruling on  
5 the dispositive motions, or otherwise by further order of the Court.  
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7       **7. Interim Status Reports:**

8       In accordance with local Rule 26-3, an Interim Status Report will be filed by the parties  
9 with the Court 60 days prior to the discovery cut-off date, and therefore not later than **April 8,**  
10 **2011.**

11      **8. Extensions or Modifications of the Discovery Plan and Scheduling Order:**

12      In accordance with Local Rule 26-4, any stipulation or motion for modification or  
13 extension of this discovery plan and scheduling order must be made no later than 20 days prior to  
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ATTORNEYS AT LAW

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1 the discovery cut-off date, and therefore not later than May 18, 2011.

2 IT IS SO STIPULATED.

3 Dated: December 15, 2010.

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Dated: December 15<sup>th</sup>, 2010.

  
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Attorney for Defendant The College Network,  
Inc.

11 IT IS SO ORDERED.



12 UNITED STATES MAGISTRATE JUDGE

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15 DATED: 12-17-10

16 **H&D HARMON & DAVIES, P.C.**  
17 Attorneys at Law  
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